

1 Jeffrey H. Howard (*pro hac vice*)
2 Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
3 1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
4 Telephone: 202-624-2500
Facsimile: 202-628-5116
5 Email: jhoward@crowell.com
 jmurphy@crowell.com

6 Jason C. Murray (CA Bar No. 169806)
7 Joshua C. Stokes (CA Bar No. 220214)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
8 Los Angeles, CA 90071
Telephone: 213-622-4750
9 Facsimile: 213-622-2690
10 Email: jmurray@crowell.com
jstokes@crowell.com

11 *Counsel for Plaintiff Motorola Mobility, Inc.*
[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17 In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master Docket No. 07-m-1827 SI

This Document Relates To:

Motorola Mobility, Inc. v. AU Optronics Corporation, et al., C 09-5840 SI

**STIPULATION AND [PROPOSED]
ORDER FURTHER EXTENDING
PLAINTIFF'S TIME TO MOVE TO
COMPEL AS TO CERTAIN
DISCOVERY**

1 Defendants Chi Mei Corp., Chimei Innolux Corp. ("Chimei Innolux"); Chi Mei
 2 Optoelectronics Corp. USA, Inc.; CMO Japan Co. Ltd.; Nexgen Mediatech, Inc.; Nexgen
 3 Mediatech USA, Inc. (collectively, "Chi Mei") and Plaintiff Motorola Mobility, Inc. ("Motorola")
 4 stipulate as follows:

5 WHEREAS Motorola served a Set of Interrogatories on Chi Mei and a set of Requests for
 6 Production of Documents on Chimei Innolux on November 4, 2011 (the "Discovery");

7 WHEREAS Chi Mei provided Responses and Objections to the Discovery on December
 8, 2011;

9 WHEREAS the parties are meeting and conferring regarding Chi Mei's Responses and
 10 Objections to the Discovery;

11 WHEREAS Chi Mei previously agreed to permit Motorola additional time to move to
 12 compel further responses to the Discovery and the Court entered an Order on December 16, 2011
 13 setting January 6, 2012 as the deadline to file motions to compel as to the Discovery;

14 WHEREAS the parties desire additional time to meet and confer to resolve their disputes
 15 regarding the Discovery, and Chi Mei has agreed to provide Motorola additional time to move to
 16 compel.

17 THEREFORE, Chi Mei and Motorola, by their respective undersigned counsel, stipulate
 18 and agree as follows:

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

The deadline for Motorola to move to compel further responses to the Discovery shall be extended to January 20, 2012.

Dated: January 4, 2012

/s/ Joshua C. Stokes

Jason C. Murray (CA Bar No. 169806)
Joshua C. Stokes (CA Bar No. 220214)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-622-4750
Facsimile: 213-622-2690
Email: jmurray@crowell.com
jstokes@crowell.com

Jeffrey H. Howard (*pro hac vice*)
Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
Email: jhoward@crowell.com
jmurphy@crowell.com

Kenneth L. Adams (*pro hac vice*)
R. Bruce Holcomb (*pro hac vice*)
Christopher T. Leonardo (*pro hac vice*)
ADAMS HOLCOMB LLP
1875 Eye Street NW
Washington, DC 20006
Telephone: 202-580-8822
Facsimile: 202-580-8821
Email: adams@adamsholcomb.com
holcomb@adamsholcomb.com
leonardo@adamsholcomb.com

Counsel for Plaintiff Motorola Mobility, Inc.

/s/ Jason M. Bussey

James G. Kreissman (SBN 206740)
Harrison J. Frahn IV (SBN 206822)
Jason M. Bussey (SBN 227185)
Michael R. Lizano (SBN 246222)
SIMPSON THACHER & BARTLETT LLP
2550 Hanover Street
Palo Alto, California 94304
jkreissman@stblaw.com
hfrahn@stblaw.com
jbussey@stblaw.com
mlizano@stblaw.com

Attorney for Defendants Chi Mei Corporation, Chimei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co., Ltd, Nexgen Mediatech, Inc. and Nexgen Mediatech USA, Inc.

IT IS SO ORDERED.

Dated: 1/4, 2012

Susan Illston

Hon. Susan Illston, United States District Judge

DCACTIVE-17192046.1